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8 *Attorneys for Defendant*
9 *Wal-Mart Stores, Inc.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SADIYYAH ABDULLAH,

13 Plaintiff,

14 v.

15 WAL-MART STORES INC.; DOES I-X,
16 inclusive, and ROE CORPORATIONS I-X,
inclusive,

17 Defendants.

Case No.: 2:17-cv-02647-GMN-VCF

SECOND AMENDED STIPULATION
AND ORDER TO EXTEND DISCOVERY
DEADLINES

[FIRST REQUEST]

19 Plaintiff SADIYYAH ABDULLAH (hereinafter “Plaintiff”) and Defendant WAL-MART
20 STORES, INC. (hereinafter “WALMART” or “Defendant”), by and through their respective counsel
21 of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and
22 discovery plan in this matter for a period of sixty (60) days for the reasons explained herein.

23 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the first such discovery
24 extension requested in this matter.

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[PROPOSED] NEW DISCOVERY DEADLINES

Expert Disclosure Deadline	March 20, 2018
Joint Interim Status Report.	March 20, 2018
Rebuttal Expert Disclosure Deadline	April 20, 2018
Discovery Cut-Off Date	May 21, 2018
Dispositive Motion Deadline	June 19, 2018
Proposed Joint Pre-Trial Order	July 17, 2018

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 15TH day of December, 2017.

DATED this 15th day of December, 2017.

/s/ David M. Menocal

/s/ Betsy C. Jefferis

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*Attorneys for Plaintiff
Sadiyyah Abdullah*

*Attorneys for Defendant
Wal-Mart Store, Inc.*

IT IS SO ORDERED:

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.



UNITED STATES MAGISTRATE JUDGE

12-18-2017
DATED: _____

1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm PHILLIPS,
3 SPALLAS & ANGSTADT, LLC, and that on this 15th day of December, 2017, I electronically served
4 a copy of **SECOND AMENDED STIPULATION AND ORDER TO EXTEND DISCOVERY**
5 **DEADLINES [FIRST REQUEST]** as follows:

- 6 ☐ By facsimile addressed to the following counsel of record, at the address listed below;
7 ☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope
8 upon which first class postage was prepaid in Las Vegas, Nevada;
9 ☐ By Hand Delivery (ROC); and/or
10 ☒ By Electronic Service through CM/ECF to:

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ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
Alex J. De Castroverde Nevada Bar No. 6950 Orlando De Castroverde Nevada Bar No. 7320 DE CASTROVERDE LAW GROUP 1149 S. Maryland Pkwy Las Vegas, NV 89104	Phone 702-383-0606 Fax 702-383-8741	Plaintiff

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17 */s/ Betsy C. Jefferis*

18 An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC

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